IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION

TAMMY JORDAN	§	
	§	
Plaintiff,	§	
	§	
v.	§	CASE NO. _______
	§	JURY DEMANDED
ALLIANCE PANCAKE PARTNERS, LLC	§	
	§	
	§	
Defendant.	§	

COMPLAINT

COMES THE PLAINTIFF, **TAMMY JORDAN**, filing this Complaint against **ALLIANCE PANCAKE PARTNERS, LLC.** She shows:

I. PARTIES, JURISDICTION, AND VENUE

1. Plaintiff, TAMMY JORDAN, is a citizen and resident of KNOXVILLE Tennessee.

2. Defendant, **ALLIANCE PANCAKE PARTNERS, LLC** is an employer of greater than eight (8) persons, including Plaintiff. It is a foreign limited liability company, formed in Delaware with a principal place of business in Georgia

3. This Court has subject matter jurisdiction under 28 U.S.C. §1332,

diversity jurisdiction, as the case involves citizens of different states with an amount in controversy exceeding $75,000.

4. Venue in this Middle District of Tennessee is proper pursuant to 28 U.S.C. §1391, because the Defendant was either doing business in this district or resides in this district, and a substantial part of the events or omissions giving rise to this action occurred in this district.

II. FACTUAL BASES FOR SUIT

5. Defendant hired Jordan to work in its Knoxville restaurant, a franchise known as "IHOP," or International House of Pancakes.

6. Defendant employed a general manager believed to be an Arab Muslim of Egyptian descent.

7. Jordan is an American born white female who maintains Christian beliefs.

8. The general manager maintains Muslim beliefs.

9. Jordan is an assertive female.

9. The general manager advised Jordan that he prays to Allah for her death.

10. The general manager advised Jordan that he wanted to cut her head off.

11. The general manager made gestures toward Jordan of a knife to

his throat, as if cutting off the head.

12. The general manager restricted Jordan's work hours and took her off the schedule.

13. Jordan complained to Defendant in writing and then addressed the concerns with an area manager on or about August 28, 2015. This person indicated he would look into matters further, but Jordan never heard further from the company. As a result, she still has not been returned to work, and she has lost her job, pay, etc. To her knowledge, nothing was done about the general manager's conduct.

14. Defendant is vicariously liable for the racial/sexual/religious and/or national origin harassment by the general manager, and directly liable for its own failure to take prompt, remedial action.

15. Plaintiff has suffered emotional damages—fright, fear, worry, anxiety, panic attacks, as well as loss of her job and financial distress. She seeks these damages along with attorneys fees and costs and any further equitable relief.

III. CAUSES OF ACTION

16. Plaintiff brings the following causes of action against Defendant:

A. **THRA, Tenn. Code Ann. 4-21-101 et. seq.**: Religious, Racial, National Origin and/or Sexual Harassment.

17. Plaintiff demands a jury.

Respectfully submitted,

GILBERT RUSSELL McWHERTER SCOTT BOBBITT PLC

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